Desert View Power LLC, an affiliate of

Greenleaf POWER

November 11, 2020
Scott Connolly
Environmental Engineer, Enforcement and Compliance Assurance Division
75 Hawthorne St. (ENF-2-1)
San Francisco, CA 94105

Subject: Desert View Power
SCAQMD FILE # 100154
Permit No. CB-ROP 05-01
NSR 4-4-11; SE 87-01
Opacity Violation at Desert View Power

Mr. Connolly,

This letter is to inform you that Desert View Power (DVP) had an opacity violation on November 10, 2020 at 12:20 am. We experienced a 34.5% opacity violation for 3 minutes. Our permit is 10% for 3 minutes.

Background

We discovered a hole in the outlet expansion joint on boiler 1 induced draft fan prior to our 2020 fall outage. A new expansion joint was procured. A contractor was awarded the work to replace it.

Root Cause Analysis

The removal of the old expansion joint was done from the outside of the fan. Debris from the removal dropped inside the fan and was not visible. When the induced draft fan was put into service Desert View Power (DVP) experienced an opacity violation of 34.5% for 3-minutes. Our permit is 10% for 3 minutes. Going forward the induced draft fans will be inspected internally if any work is performed before starting of the fan.
DVP reported the violation to both the South Coast Air Quality Management District and the EPA over the phone. Attached is the Form 500-N Title V - Deviations, Emergencies & Breakdowns that was mailed and emailed to SCAQMD.

Regards,

Jim Robertson
Plant Manager
Desert View Power
62-300 Gene Welmas Drive
Mecca, CA 92554

CC Mr. Kenneth Dudash
South Coast Air Quality Management District

Mr. Andrew Chew
U.S. EPA, Region 9

[redacted]

South Coast Air Quality Management District

Form 500-N

Title V - Deviations, Emergencies & Breakdowns

*This written report is in addition to requirements to verbally report certain types of incidents. Verbal reports may be made by calling AQMD at 1-800-288-7664 (1-800-CUT-SMOG) or AQMD enforcement personnel.

Mail To:
SCAQMD
P.O. Box 4941
Diamond Bar, CA 91765-0941

Tel: (909) 396-3385
www.aqmd.gov

Section I - Operator Information

1. **Facility Name** (Business Name of Operator That Appears On Permit): Desert View Power

2. **Valid AQMD Facility ID** (Available On Permit Or Invoice Issued By AQMD): 100154

3. **Address:** (where incident occurred) 62-300 Gene Welmas Drive (Street Address)
Mecca (City) CA (State) 92254 (Zip)

4. **Mailing Address:** (if different from Item 3) Same as above (Street Address)
(City) (State) (Zip)

5. **Provide the name, title, and phone number of the person to contact for further information:**

Kevin Lawrence	Operations Manager	(760) 262-1644
Name	Title	Phone #

Section II - Reporting of Breakdowns, Deviations, and Emergencies

1. **This written notification is to report a(n):**

Type of Incident	Verbal Report Due*	Written Report Due
a. ☐ Emergency under Rule 3002(g)	Within 1 hour of discovery	Within 2 working days from when the emission limit was exceeded.
b. ☒ Breakdown under:		
☒ Rule 430 (Non-RECLAIM)	For Rules 430 & 2004 - Within 1 hour of discovery.	For Rules 430 & 2004 - Within 7 calendar days after breakdown is corrected, but no later than 30 days from start of the breakdown, unless a written extension is granted.
☐ Rule 2004 (RECLAIM)		
☐ Rule 218 (Non-RECLAIM) [See Rule 218(f)(3)]	For Rule 218 – Within 24 hours or next business day for failure/shutdown exceeding 24 hours	For Rule 218 - With required semi-annual reports.
c. ☐ Deviation with excess emissions [See Title V Permit, Section K, Condition No. 22B]	Within 72 hours of discovery of the deviation or shorter reporting period if required by an applicable State or Federal Regulation.	Within 14 days of discovery of the deviation.
d. ☐ Other Deviation [See Title V Permit, Section K, Condition Nos. 22D & 23]	None	With required semi-annual monitoring reports.

2. **The incident was first discovered by:** Louie Lopez (Name) **on** 11/10/2020 (Date) 12:20 (Time) ◉ AM ○ PM

3. **The incident was first reported by:** Operator 4 (Name of AQMD Staff Person) **on** 11/10/2020 (Date) 12:55 (Time) ◉ AM ○ PM

a. ◉ Via Phone

b. ○ In Person

Notification Number (Required): 6323155

4. **When did the incident actually occur?** 11/10/2020 (Date) 12:20 (Time) ◉ AM ○ PM

AQMD USE ONLY

Received By:		Assigned By:	Inspector:
Date/Time Received:		Date/Time Assigned:	Date/Time Received Assignment:
Date Delivered To Team:		Date Reviewed Inspector Report:	Date Inspected Facility:
Team:	Sector:	Breakdown/Deviation Notification No.	Date Completed Report:

Recommended Action: Cancel Notification Grant Relief Issue NOV No.____ Other:____

Final Action: Cancel Notification Grant Relief Issue NOV No.____ Other:____

5. **Has the incident stopped?** a. (•) Yes, on: 11/10/2020 (Date) 12:20 (Time) (•) AM ( ) PM b. ( ) No

6. **What was the total duration of the incident?** 0 (Days) 05 (Hours)

7. **For equipment with an operating cycle, as defined in Rule 430 (b)(3)(A), when was the end of the operating cycle during which the incident occurred?** _____ (Date) _____ (Time) ( ) AM ( ) PM

8. **Describe the incident and identify each piece of equipment (by permit, application, or device number) affected. Attach photos (when available) of the affected equipment and attach additional pages as necessary.**

Boiler 1 had just completed it's fall outage. During start up of boiler 1 induced draft fan we had a 34.5% opacity violation for 3 minutes.

9. **The incident may have resulted in a:**

a. [X] Violation of Permit Condition(s): EPA Permit # CB-ROP 05-01

b. [ ] Violation of AQMD Rule(s): _____

10. **What was the probable cause of the incident? Attach additional pages as necessary.**

During the fall outage on boiler 1 the outlet expansion joint for the induced draft fan was replaced by contractors. The old one was damaged. During the work debris was left inside the fan. When the fan was started the opacity violation occurred.

11. **Did the incident result in excess emissions?** ( ) No (•) Yes (Complete the following and attach calculations.)

[ ] VOC _____ lbs [ ] NOx _____ lbs [ ] SOx _____ lbs [ ] H2S _____ lbs

[ ] CO _____ lbs [X] PM _____ lbs [ ] Other: _____ lbs _____ pollutant

12. ***For RECLAIM facilities Subject to Rule 2004 (i)(3) ONLY:*** **If excess emissions of NOx and/or SOx were reported in Item 11, do you want these emissions to be counted when determining compliance with your annual allocations?**

a. ( ) Yes, for: [ ] NOx [ ] SOx b. ( ) No, for: [ ] NOx [ ] SOx

If box 12(b) above is checked, include all information specified in Rule 2004(i)(3)(B) and (C), as applicable.

13. **Describe the steps taken to correct the problem (i.e., steps taken to mitigate excess emissions, equipment repairs, etc.) and the preventative measures employed to avoid future incidents. Include photos of the failed equipment if available and attach additional pages as necessary.**

To ensure that this does not happen again operations will thoroughly inspect any fans before releasing it for operation. Cleaning out any and all debris so that it does not cause an opacity violation again.

14. **Was the facility operating properly prior to the incident?**

a. (•) Yes b. ( ) No, because: _____

15. **Did the incident result from operator error, neglect or improper operation or maintenance procedures?**

a. ( ) Yes b. (•) No, because: The expansion joint was replaced from the outside of the duct, inside not visible.

16. **Has the facility returned to compliance?**

a. ( ) No, because: _____

b. (•) Yes (Attach evidence such as emissions calculations, contemporaneous operating logs or other credible evidence.)

Section III - Certification Statement

I certify under penalty of law that based on information and belief formed after reasonable inquiry, the statements and information in this document and in all attachments and other materials are true, accurate, and complete.

For Title V Facilities ONLY: [X] **I also certify under penalty of law that that I am the responsible official for this facility as defined in AQMD Regulation XXX.**

1. Signature of Responsible Official:	2. Title of Responsible Official:
	Plant Manager
3. Print Name:	**4. Date:**
Jim Robertson	11/12/2020
5. Phone #:	**6. Fax #:**
(760) 262-1600	

7. Address of Responsible Official:

62-300 Gene Welmas Drive (Street #) | Mecca (City) | CA (State) | 92254 (Zip)

Colmac Energy

Mecca, CA

Daily Stack 3-Min Opacity Report

November 10, 2020

3-Min Avg Opacity Limit - 10

Hour	00-03 30-33	03-06 33-36	06-09 36-39	09-12 39-42	12-15 42-45	15-18 45-48	18-21 48-51	21-24 51-54	24-27 54-57	27-30 57-60
00	2.8	2.8	2.9	2.8	2.8	2.8	34.5	6.9	4.0	2.9
	4.8	3.0	2.8	2.4	2.4	2.4	2.4	2.4	2.4	2.4
01	2.3	2.3	2.3	2.3	2.3	2.3	2.3	2.3	2.3	2.4
	2.3	2.3	2.3	2.3	2.3	2.3	2.3	2.3	2.3	2.3
02	2.3	2.4	2.4	2.3	2.4	2.3	2.3	2.3	2.3	2.3
	2.3	2.3	2.3	2.4	2.3	2.3	2.3	2.3	2.3	2.3
03	2.3	2.3	2.3	2.3	2.3	2.3	2.3	2.2	2.2	2.2
	2.3	2.2	2.2	2.2	2.3	2.3	2.2	2.3	2.2	2.2
04	2.2	2.2	2.2	2.3	2.2	2.3	2.3	2.2	2.2	2.2
	2.2	2.3	2.3	2.2	2.2	2.2	2.3	2.2	2.2	2.3
05	2.3	2.2	2.2	2.2	2.2	2.2	2.2	2.2	2.2	2.2
	2.2	2.2	2.2	2.2	2.3	2.2	2.2	2.1	2.2	2.2
06	2.3	2.3	2.3	2.3	2.4	2.4	2.4	2.4	2.4	2.4
	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.6	2.6
07	2.6	2.6	2.6	2.6	2.6	2.6	2.6	2.6	2.6	2.6
	2.6	2.6	2.7	2.6	2.6	2.6	2.6	2.6	2.7	2.7
08	2.7	2.6	2.7	2.6	2.7	Cal	Cal	Cal	2.7	2.8
	2.7	2.4	2.4	2.5	2.4	2.4	2.4	2.4	2.4	2.5
09	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5
	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5
10	2.5	2.4	2.5	2.4	2.4	2.5	2.4	2.4	2.4	2.4
	2.4	2.4	2.4	2.4	2.4	2.4	2.4	2.4	2.4	2.4
11	2.4	2.4	2.4	2.4	2.4	2.4	2.4	2.4	2.4	2.4
	2.4	2.4	2.4	2.4	2.4	2.3	2.3	2.4	2.3	2.5
12	2.4	2.4	2.4	2.4	2.4	2.4	2.4	2.4	2.4	2.4
	2.4	2.4	2.4	2.4	2.4	2.4	2.4	2.4	2.4	2.4
13	2.4	2.4	2.4	2.4	2.4	2.4	2.4	2.4	2.4	2.4
	2.4	2.4	2.4	2.4	2.4	2.4	2.4	2.4	2.4	2.4
14	2.4	2.4	2.4	2.4	2.4	2.4	2.4	2.4	2.4	2.4
	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.4	2.5	2.5
15	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5
	2.5	2.5	2.4	2.4	2.4	2.5	2.5	2.5	2.5	2.5
16	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5
	2.5	2.5	2.4	2.5	2.5	2.5	2.5	2.5	2.5	2.5
17	2.5	2.5	2.4	2.5	2.5	2.5	2.5	2.5	2.5	2.5
	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5
18	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5
	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5
19	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5
	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5
20	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5
	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.6

Hour	00-03 30-33	03-06 33-36	06-09 36-39	09-12 39-42	12-15 42-45	15-18 45-48	18-21 48-51	21-24 51-54	24-27 54-57	27-30 57-60
21	2.6	2.6	2.6	2.6	2.7	2.7	2.6	2.6	2.6	2.7
	2.7	2.7	2.7	2.7	2.8	2.8	2.8	2.8	2.8	2.8
22	3.6	3.2	3.4	3.6	4.0	4.1	4.1	4.0	4.0	3.9
	3.9	3.9	3.8	3.9	3.9	4.0	3.8	3.7	3.0	2.7
23	2.5	2.9	3.1	4.2	3.9	3.8	3.7	3.5	3.2	3.1
	3.0	3.0	3.1	3.1	2.8	2.7	2.7	2.8	2.8	2.8

Boilers Stack Excess Emissions

Colmac Energy

Opacity % 3-Min Avg Excess Emissions for 11/10/2020

Parameter	Start	End	Duration	Value	Min	Max	Limit	Reason	Action
Opacity % 3-Min Avg	11/10/2020 12:18 AM	12:20 AM	3 minutes	35.0	35.0	35.0	10	*Not specified*	
Total duration			3 minutes						